

STATE OF SOUTH CAROLINA

COUNTY OF DorchesterLorilei Perry

Plaintiff(s)

vs.

Kenneth Perry, Et Al.

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

-CP-

2014-CP-18-

409

(Please Print)

Submitted By: Lorilei PerryAddress: 103 Anstead Dr.
Summerville, SC 29485

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

843-568-8206

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

☒ JURY TRIAL demanded in complaint.☐ NON-JURY TRIAL demanded in complaint.☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.☐ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

Contracts

- ☐ Constructions (100)
☐ Debt Collection (110)
☐ Employment (120)
☐ General (130)
☐ Breach of Contract (140)
☐ Other (199)

Torts - Professional Malpractice

- ☐ Dental Malpractice (200)
☐ Legal Malpractice (210)
☐ Medical Malpractice (220)
☐ Previous Notice of Intent Case #
 20 -CP-
☐ Notice/ File Med Mal (230)
☐ Other (299)

Torts - Personal Injury

- ☐ Assault/Slander/Libel (300)
☐ Conversion (310)
☐ Motor Vehicle Accident (320)
☐ Premises Liability (330)
☐ Products Liability (340)
☐ Personal Injury (350)
☐ Wrongful Death (360)
☒ Other (399)

Real Property

- ☐ Claim & Delivery (400)
☐ Condemnation (410)
☐ Foreclosure (420)
☐ Mechanic's Lien (430)
☐ Partition (440)
☐ Possession (450)
☐ Building Code Violation (460)
☐ Other (499)

Inmate Petitions

- ☐ PCR (500)
☐ Mandamus (520)
☐ Habeas Corpus (530)
☐ Other (599)

Administrative Law/Relief

- ☐ Reinstate Drv. License (800)
☐ Judicial Review (810)
☐ Relief (820)
☐ Permanent Injunction (830)
☐ Forfeiture-Petition (840)
☐ Forfeiture-Consent Order (850)
☐ Other (899)

Special/Complex /Other

- ☐ Environmental (600)
☐ Automobile Arb. (610)
☐ Medical (620)
☐ Other (699)
☐ Sexual Predator (510)

- ☐ Pharmaceuticals (630)
☐ Unfair Trade Practices (640)
☐ Foreign Subpoenas (650)
☐ Motion to Quash Subpoena
 in Out-of-County Action
 (660)

Judgments/Settlements

- ☐ Death Settlement (700)
☐ Foreign Judgment (710)
☐ Magistrate's Judgment (720)
☐ Minor Settlement (730)
☐ Transcript of Judgment (740)
☐ Lis Pendens (750)
☐ Transfer of Structured Settlement
 Payment Rights Application (760)
☐ Confession of Judgment (770)
☐ Petition for Workers
 Compensation Settlement
 Approval (780)

☐ Other (799)

Appeals

- ☐ Arbitration (900)
☐ Magistrate-Civil (910)
☐ Magistrate-Criminal (920)
☐ Municipal (930)
☐ Probate Court (940)
☐ SCDOT (950)
☐ Worker's Comp (960)
☐ Zoning Board (970)
☐ Public Service Commission (990)
☐ Employment Security Commission
 (991)

☐ Other (999)

Submitting Party Signature:

Lorilei Perry

Date:

10 Mar 2014

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

FOR MANDATED ADR COUNTIES ONLY

Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Berkeley, Calhoun, Charleston, Cherokee, Clarendon, Colleton, Darlington, Dorchester, Florence, Georgetown, Greenville, Hampton, Horry, Jasper, Kershaw, Lee, Lexington, Marion, Oconee, Orangeburg, Pickens, Richland, Spartanburg, Sumter, Union, Williamsburg, and York

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

You are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

**Please Note: You must comply with the Supreme Court Rules regarding ADR.
Failure to do so may affect your case or may result in sanctions.**

SOUTH CAROLINA
COUNTY OF DORCHESTER

IN THE COURT OF COMMON
PLEAS

Lorilei Perry

Plaintiff

vs.

Case No.: 2014-CP-18- 409

SUMMONS

Kenneth Perry, John G. Frampton,
William Wylie, Nancy McLinn,
Leslie Riddle, Tara Richardson,
Katrina Patton, Dorchester Police Dept,
Metro Police Dept., Dorchester County
Code Enforcement, Merriel Greenhill

Defendants

CERTIFIED COPY
2014 MAR 10 PM 12:26
Clerk of Court
DORCHESTER COUNTY

TO THE DEFENDANTS ABOVE NAMED: John G. Frampton

You are hereby summoned to appear in a Common Law Court of Pleas to answer to the charges levied against you. Police departments may send a representative to stand in defence against the allegations levied against these departments. This trial will be by jury. Court date is set for _____ (date), _____ (time) at _____ (address).

Lorilei Perry
Lorilei Perry

SUMMERVILLE, DORCHESTER COUNTY

THE PEOPLE OF THE STATE OF SOUTH CAROLINA

A fictitious foreign corporate created entity an ens legis
being used to conceal fraud, represented by prosecutor.

-v-

Lorilei Perry
Plaintiff

-a-

Kenneth C. Perry
John G. Frampton,
Nancy McLinn, Leslie Riddle,
William Wylie, Tara Richardson,
Katrina Patton, Dorchester County
Police Dept, Metro Police Dept,
Dorchester Code Enforcement,
Merriel Greenhill
Defendants

Court of Common
Pleas

Case No

2014-CP-18-

409

VERIFIED ACTION AT LAW
W/AFFIDAVIT ATTACHED

CERTIFIED COPY
2014 MAR 10 PM 12:26
Clerk of Court
DORCHESTER COUNTY

Lorilei Perry, one of the People¹ of South Carolina, hereinafter plaintiff, in this court of record², proceeding according to the common law³ hereby sues Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester County Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merriel Greenhill; herein after defendants for fraud on the court, conspiracy against rights:⁴, deprivation of rights under color of law: ⁵, conspiracy to interfere with civil rights:⁶, action for neglect to prevent ⁷, civil action for

¹ PEOPLE. People are supreme, not the state. [Waring vs. the Mayor of Savannah, 60 Georgia 93]; The state cannot diminish rights of the people. [Hertado v. California, 100 US 516]; Preamble to the US and NY Constitutions - We the people ... do ordain and establish this Constitution...; ...at the Revolution, the sovereignty devolved on the people; and they are truly the sovereigns of the country, but they are sovereigns without subjects...with none to govern but themselves... [CHISHOLM v. GEORGIA (US) 2 Dall 419, 454, 1 L Ed 440, 455, 2 DALL (1793) pp471-472]; The people of this State, as the successors of its former sovereign, are entitled to all the rights which formerly belonged to the King by his prerogative. [Lansing v. Smith, 4 Wend. 9 (N.Y.) (1829), 21 Am. Dec. 89 10C Const. Law Sec. 298; 18 C Em.Dom. Sec. 3, 228; 37 C Nav.Wat. Sec. 219; Nuls Sec. 167; 48 C Wharves Sec. 3, 7].

² Article VI. b. ... the supreme court ... shall be courts of record.

³ COMMON LAW - As distinguished from law created by the enactment of legislatures [admiralty], the common law comprises the body of those principles and rules of action, relating to the government and security of persons and property, which derive their authority solely from usages and customs of immemorial antiquity, or from the judgments and decrees of the courts recognizing, affirming, and enforcing such usages and customs; and, in this sense, particularly the ancient unwritten law of England. [1 Kent, Comm. 492. Western Union Tel. Co. v. Call Pub. Co., 21 S.Ct. 561, 181 U.S. 92, 45 L.Ed. 765; Barry v. Port

Jervis, 72 N.Y.S. 104, 64 App. Div. 268; U. S. v. Miller, D.C. Wash., 236 F. 798, 800.];

⁴ 18 USC §241; CONSPIRACY AGAINST RIGHTS: If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State in the free exercise or enjoyment of any right they shall be fined under this title or imprisoned not more than ten years, or both

⁵ 18 USC §242: DEPRIVATION OF RIGHTS UNDER COLOR OF LAW: Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State the deprivation of any rights shall be fined under this title or imprisoned not more than one year, or both;

⁶ 42 USC 1985: CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS: If two or more persons in any State or Territory conspire for the purpose of depriving, either directly or indirectly any persons rights the party so injured or deprived may have an action for the recovery of damages against any one or more of the conspirators.

deprivation of rights, RICO (racketeering, extortion, misuse of permits, mail fraud)⁹, Misprision of felony¹⁰, and Trespass on the case¹²,

"Plaintiff" accept the oaths¹³, & bonds of all the officers of this court, including attorneys.

*"Silence can only be equated with fraud where there is a legal or moral duty to speak, or where an inquiry left unanswered would be intentionally misleading ..."*¹⁴

JURISDICTION

This is a common law court, plaintiff does not subscribe to the fraud of fiction of nisi prius courts, not of record¹⁵ which have no standing in a court at law¹⁶. As with biblical truth the common law tradition abhors the priestcraft¹⁷ of secret knowledge and demands that its principles remain available to all, that all may enjoy its liberties. Therefore the common law

⁷ 42 USC §1986: ACTION FOR NEGLECT TO PREVENT Every person who, having knowledge that any of the wrongs conspired to be done or are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured

⁸ 42 USC 1983: CIVIL ACTION FOR DEPRIVATION OF RIGHTS: Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State subjects, or causes to be subjected, any person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law.

⁹ 18 USC Chapter 96 RICO § 1961 racketeering; section 1952 & section 1957 extortion; section 1546 misuse of permits; section 1341 mail fraud;

¹⁰ 18 USC §4 Misprision of felony. Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.

¹¹ 18 USC §1341 - Frauds through postal service

¹² TRESPASS ON THE CASE. The form of action, at common law, adapted to the recovery of damages for some injury resulting to a party from the wrongful act of another, unaccompanied by direct or immediate force, or which is the indirect or secondary consequence of defendant's act. Commonly called, by abbreviation, "Case." Munal v. Brown, C.C.Colo., 70 F. 968; Nolan v. Railroad Co., 70 Conn. 159, 39 A. 115, 43 L.R.A. 305; New York Life Ins. Co. v. Clay County, 221 Iowa 966, 267 N.W. 79, 80.

¹³ Oaths: Article VI: "This Constitution, and the laws of the United States... shall be the supreme law of the land; and the judges in every State shall be bound thereby; anything in the Constitution or laws of any State to the contrary notwithstanding... All executive and judicial officers, both of the United States and of the several States, shall be bound by oath or affirmation to support this Constitution."

¹⁴ U.S. v. Tweel, 550 F.2d 297, 299. See also U.S. v. Prudden, 424 F.2d 1021, 1032; Carmine v. Bowen, 64 A. 932

¹⁵ Any court proceeding according to statutory law is not a court of record, which only proceeds according to common law; it is an inferior court. [Ex parte Watkins, 3 Pet., at 202-203. [cited by SCHNECKLOTH v. BUSTAMONTE, 412 U.S. 218, 255 (1973)].

¹⁶ AT LAW. Blacks 4th This phrase is used to point out that a thing is to be done according to the course of the common law; it is

distinguished from a proceeding in equity

¹⁷ America's Founders discerned this conflict to be the struggle of liberty against priestly power. Thomas Jefferson wrote to Alexander von Humbolt in 1813: "History, I believe, furnishes no example of a priest-ridden people maintaining a free civil government. This marks the lowest grade of ignorance of which their civil as well as religious leaders will always avail themselves for their own purposes." The following year he wrote to Horatio G. Spafford: "In every country and in every age, the priest has been hostile to liberty. He is always in alliance with the despot, abetting his abuses in return for protection to his own."

tradition does not reserve knowledge of its principles for attorneys only. The true judges (tribunal) of the common law tradition demand ideals of a fair contest aimed at a fair result. Any attempt by the officers of the court to move in the direction of fiction will be considered an act of lawless violence and said court would be vulnerable to collateral attack from the superior court of record. See attached memorandum, "Jurisdiction and Law" incorporated by reference as though fully stated herein; Because common law's only concern is justice it draws no distinction between criminal and non-criminal cases. Because violence is at the core of this case this court is proceeding in pursuit of restitution, both pecuniary and imprisonment demanded under code, upon servants and others who acted under color of law and committed violence.

"No judicial process, whatever form it may assume, can have any lawful authority outside of the limits of the jurisdiction of the court or judge by whom it is issued; and an attempt to enforce it beyond these boundaries is nothing less than lawless violence." Ableman v. Booth³

*"Courts not of record are those of inferior dignity, which have no power to fine or imprison, and in which the proceedings are not enrolled or recorded."*¹⁸

Magistrates in courts of record are expected to know the law and their proper role, the accompanying attachment, "Law of the Case" is incorporated by reference as though fully stated herein for the same;

JUDICIAL NOTICE¹⁹

Our U.S. Constitution for the united States of America Article III section 2, Bill of Rights 5th & 7th Amendments all agree that the Law of the Land is Common Law as expressed by the Supremacy Clause:

¹⁸ 3 Bl. Comm. 24; 3 Steph. Comm. 383; The Thomas Fletcher, C.C.Ga., 24 F. 481; Ex parte Thistleton, 52 Cal 225; Erwin v. ACTION AT LAW

U.S., D.C.Ga., 37 F. 488, 2 L.R.A. 229; 95 Heininger v. Davis, 96 Ohio St. 205, 117 N.E. 229, 231.

¹⁹ JUDICIAL COGNIZANCE. Judicial notice, or knowledge upon which a judge is bound to act without having it proved in evidence. [Black's Law Dictionary, 5th Edition, page 760.] Jurisdiction is the authority by which courts and judicial officers take Cognizance of and decide cases. [Board of Trustees of Firemen's Relief and Pension Fund of City of Marietta v. Brooks, 179 Okl. 600, 67 P.2d 4, 6; Morrow v. Corbin, 122 Tex. 553, 62 S.W.2d 641; State v. Barnett, 110 Vt. 221, 3 A.2d 521, 526;]

"This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the Constitution or laws of any State to the contrary notwithstanding" US Constitution Article VI Clause 2

*"We (judges) have no more right to decline the exercise of jurisdiction which is given, than to usurp that which is not given. The one or the other would be treason to the Constitution."*²⁰

"... Thus, the particular phraseology of the constitution of the United (50) States confirms and strengthens the principle, supposed to be essential to all written constitutions, that a law repugnant to the constitution is void, and that courts, as well as other departments, are bound by that instrument." Marbury v. Madison 5 U.S. 137 (1803)

FACTS OF THE CASE

- 1) All eleven defendants had a duty to act and when they did not act they entered into a conspiracy.
- 2) Defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Merriel Greenhill committed fraud on the court when they conspired to rob plaintiff of her unalienable rights when they secretly agreed to hijack plaintiffs into a foreign court, a/k/a nisi prius court which is not a court of record.
- 3) Defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept, Metro Police Dept, Dorchester County Code Enforcement, Merrial Greenhill did conspire against plaintiff to oppress, threaten, and intimidate conspiracy against the unalienable rights of plaintiffs in violation of 18 USC §241;

- 4) Defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merriel Greenhill did under color of law willfully subject plaintiff of a deprivation their rights in violation of 18 USC §242:
- 5) Defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merriel Greenhill did conspire to interfere with rights by depriving plaintiff of her unalienable rights and therefore have suffered significant damages namely fear of police, psychological damages namely loss of a sense of security, paranoia, health issues,
- ²⁰ Cohen v. Virginia, (1821), 6 Wheat. 264 and U.S. v. Will, 449 U.S. 200
loss of perfect credit history, loss of income, loss of reputation in violation of 42 USC 1985.
- 6) Defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill are liable because they had knowledge and the power to prevent the wrongs conspired and being committed but instead neglected to prevent in violation of 42 USC §1986:
- 7) Defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill under color of statute deprived plaintiff of their unalienable rights and therefore are liable to the injured plaintiff in an action at law, in violation of 42 USC 1983:

- 8) Defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester

County Code Enforcement, Merrial Greenhill did engage in racketeering, extortion, misuse of permits fraud against plaintiffs in violation of 18 USC Chapter 96 RICO § 1961 racketeering; section 1952

& section 1957 extortion; section 1546 misuse of permits;

9) Defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill had knowledge of a felony and concealed it in violation of 18 USC §4 Misprision of felony.

10) Defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill all committed wrongful acts against the plaintiff in violation of Trespass on the case.

11) Defendants Dorchester Police Dept. and Metro Police Dept. did unlawfully carry out a search warrant on Plaintiff's home, putting her life and the lives of others in the home in imminent jeopardy and causing extreme mental distress and distrust.

12) Defendants Dorchester County Code Enforcement and Merrial Greenhill did harass the Plaintiff at her home and refused to identify her accusers.

WHEREFORE, PLAINTIFF MOVES THE COURT TO FIND FOR THE PLAINTIFF

Against defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill for \$50,000.00 in damages each for conspiracy and failing to act for a total of \$550,000.00:

Against defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester County Code Enforcement, Merrial Greenhill for \$50,000.00 in damages each for fraud on the court for a total of \$500,000.00:

Against defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Merrial Greenhill all in violation of 18 USC §241, plaintiff demand 10 years in prison.

Against defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Merrial Greenhill all in violation of 18 USC §242, plaintiffs demand one year in prison.

Against defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill for damages suffered by plaintiff namely fear of police, psychological damages namely loss of a sense of security and paranoia, health issues, loss of perfect credit history, loss of income, loss of reputation in violation of 42 USC 1985 for \$10,000,000.00:

Against defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill all had knowledge and neglected to prevent in violation of 42 USC

§1986:

Against defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill under color of statute deprived plaintiff of their unalienable rights and therefore are liable to the injured plaintiff in an action at law, in violation of 42 USC 1983:

Against defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill did engage in racketeering,

Against defendants John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Merrial Greenhill for three years in prison for knowledge of a felony and concealment of the same in violation of 18 USC §4 Misprision of felony, plaintiffs demand 3 years in prison.

Against, defendants Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester Police Dept., Metro Police Dept., Dorchester County Code Enforcement, Merrial Greenhill all committed wrongful acts against the plaintiffs in violation of Trespass on the case.

Against, defendants damages Kenneth C. Perry, John G. Frampton, Nancy McLinn, Leslie Riddle, William Wylie, Tara Richardson, Katrina Patton, Dorchester County Code Enforcement, Merrial Greenhill for threat of illegal incarceration totalling 180 days at \$50,000/day =

\$9,000,000.00.

Against the defendants Dorchester County Police Dept. , Metro Police Dept., Dorchester County Code Enforcement damages of \$25, 000.000.00 each for a total of \$75,000,000.00 for endangering Plaintiff's life, invasion of her privacy, harassment and threats against her liberty.

ACTION AT LAW

PERRY -A- PERRY

PAGE 9 OF 10

I, **Lorilei Perry**, Affiants, being of lawful age, qualified and competent to testify to and having firsthand knowledge of the abovementioned facts and do hereby swear that the said facts are true, correct and not misleading:

Lorilei Perry
Lorilei Perry, Plaintiff

NOTARY

South Carolina, Dorchester County ^{8TH} day of MARCH, 2014 before me
on this Lorilei Perry

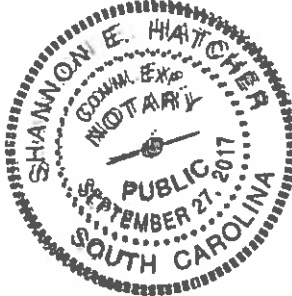
the subscriber, personally appeared ~~Your Name~~ to me known to be the living people describe in and who executed the forgoing instrument and sworn before me that they executed the same as their free will act and deed.

My commission expires: 9/27/17

(Notary Seal)

Notary

Shannon Hatcher



STATE OF SOUTH CAROLINA,

CERTIFIED COPY

COUNTY OF Dorchester

2014 MAY 19 PM 12:37

IN THE COURT OF COMMON PLEAS

Amended SummonsLorilei PerryCheryl Adams
Plaintiff

SUMMONS

vs.

CLERK OF COURT
DORCHESTER COUNTYFILE NO. 2014-CP-18-409Kenneth Perry, et al

Defendant.

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

St. George

, South Carolina

Lorilei Perry

Plaintiff/Attorney for Plaintiff

Dated: 19 May 2014

Address:

103 Anstead Dr.
Summerville, SC 29485

SUMMERVILLE, DORCHESTER COUNTY

COURT OF COMMON PLEAS

Lorilei Perry
Plaintiff

Case No.: 2014-CP-18-409

Amended Complaint

Amendments to Original Case

Filed

v.

Kenneth Perry, et al
Defendants

Sheryl Anderson
CLERK OF COURT
DORCHESTER COUNTY
2014 MAY 19 PM 12:37
CERTIFIED COPY

Here comes now, Lorilei Perry, one of the sovereign people of South Carolina, in an effort to clarify whom she has named as defendants wishes to make the following changes to the original complaint.

Where the name Tara Richardson is named, this name should read Tera Richardson.

Where the name Nancy McLinn is named, this name should read Nancy McLin.

Where the Dorchester County Police Department is named, it should read Summerville Police Department.

Where Metro Police Department is named, Plaintiff recognizes the Summerville Police Department heads this division of law enforcement. Therefore, Metro Police Department should be removed from the list of defendants as they are the same entity as Summerville Police Department.

Plaintiff wishes to add one more defendant to the list, Dorchester County Sheriffs Department in place of Metro Police Department with the same conditions to apply to this defendant as was originally attributed to the Metro Police Department.

Plaintiff also wishes to clarify that while several US Codes including (but not limited to) 18 USC 241, 18 USC 242 and 42 USC 1985 were cited in her complaint, her complaint stems from Constitutional violations, therefore, the Constitution will also be included with the other codes cited.

All other conditions within the original complaint remain as is with only the changes above mentioned implemented.

I, **Lorilei Perry**, Affiants, being of lawful age, qualified and competent to testify to and having firsthand knowledge of the abovementioned facts and do hereby swear that the said facts are true, correct and not misleading:

Lorilei Perry

Lorilei Perry, Plaintiff

Cheryl Williams
CLERK OF COURT
DORCHESTER COUNTY
2014 MAY 19 PM 12:35
CERTIFIED COPY

NOTARY

South Carolina,
Dorchester County on this

day
of _

, 2014 before me

the subscriber, personally appeared Lorilei Perry to me known to be the living people describe in and who executed the forgoing instrument and sworn before me that they executed the same as their free will act and deed.

My commission
expires: _

(Notary Seal)

Notary